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Attorney for AARP

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR A HEARING TO DETERMINE THE
FAIR VALUE OF THE UTILITY PROPERTY
OF THE COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN THEREON,
TO APPROVE RATE SCHEDULES
DESIGNED TO DEVELOP
SUCH RETURN.

Case No.: E-01345A-19-0236

APPLICATION TO INTERVENE

Filed: March 4, 2020

**APPLICATION TO INTERVENE
OF AARP**

COMES NOW **AARP**¹, pursuant to Arizona Revised Statutes § 40-360.05(A)(3) and Rules 14-3-103(A), (E), 14-3-104 and 14-3-105 of the Arizona Administrative Code, by and through its attorneys and representatives, respectfully petitions the Arizona Corporation Commission ("Commission") for permission to intervene in the above-captioned proceeding.

In support thereof, AARP states as follows:

¹ In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has more than **910,000 members in the state of Arizona**, a substantial number of which are residential electric customers served by the Arizona Public Service Company (“APS”).

2. Mr. Armando Nava (“Mr. Nava”), an attorney duly licensed and in good standing in Arizona and Mr. John B. Coffman (“Mr. Coffman”), an attorney duly licensed and in good standing in Missouri, are authorized to accept service of papers in this proceeding on behalf of AARP. All notices, orders, and correspondence should be directed to Mr. Nava in Phoenix, Arizona and Mr. Coffman in St. Louis, Missouri, on behalf of AARP, at the addresses set forth below.

3. AARP requests that Mr. Nava be added to the service list. An application to admit Mr. Coffman pro hac vice in Arizona is also being filed with the State Bar of Arizona.

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John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Phone: (573) 424-6779
Email: john@johncoffman.net

AARP also requests that Mr. Steve Jennings be added to the service list.

Steve Jennings
Associate State Director, AARP Arizona

7250 North 16th Street #302
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(602) 262-5180
Sjennings@aarp.org

4. On October 1, 2019, Arizona Public Service Company ("APS" or "Company") filed an application requesting a hearing to determine the fair value of the utility property of the Company for ratemaking purposes, to fix a just and reasonable rate of return thereon, to approve rate schedules designed to develop such return.

5. Statement of Substantial Interest: AARP desires to advocate on behalf of the residential electric customers of APS in order to ensure that their rates are no higher than a level that is just and reasonable. More specifically, AARP's interest relates to how APS's proposal may directly, substantially and adversely impact those customers who are aged 50 and over. People aged 50 and over are more vulnerable to increases in energy prices. These consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs, as they often spend more time in their residences. Many older consumers also have special needs and safety concerns with regard to their access to electric service. AARP's specific and substantial interest in this proceeding cannot be adequately represented by other parties.

6. AARP's interest and intervention in protecting residential electric consumers in this rate case proceeding is supported pursuant to Arizona law. [See, e.g., A.A.C. R14-3-105 ("Persons, other than the original parties to the proceedings, who are directly and substantially affected by the proceedings" may participate as intervenors upon securing an order from the

Commission)]. As set forth above, AARP has a particular interest in protecting individuals over the age of 50, as they will likely be substantially affected by these proceedings.

7. AARP is aware that this application is being filed later than the date set for interventions in this matter. AARP had intended to file by February 11, 2020; however, difficulties in securing local counsel unfortunately delayed this filing. AARP apologizes for the delay and agrees to accept the procedural status of this rate case as it currently stands. Since no opportunities for input or deadlines for intervenor testimony on substantive remaking issues have yet passed, AARP does not believe that the date of this application for intervention will unduly delay this proceeding nor prejudice the rights of any other party.

8. AARP plans to offer the expert witness testimony of Scott Rubin in this matter on various issues including those regarding APS's residential rate design. AARP reserves the right to offer testimony or otherwise address other issues that may arise pursuant to discovery or that are raised by other parties.

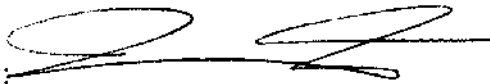
9. AARP intends to be an active participant on revenue requirement and rate design issues that impact residential electric consumers. AARP has been granted intervention by the Commission in previous rate cases, including APS's previous general rate case (Case No. E-01345A-16-0036), and believes that AARP's testimony and participation in those cases assisted in developing a full and adequate record.

10. AARP believes that its intervention and participation in this proceeding would serve the public interest and wishes to become a party to this case for all purposes. Moreover, AARP can assure that its intervention would not unduly delay the proceedings nor prejudice the rights of any other party.

WHEREFORE, AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

Dated this 4th day of March, 2020.

By: 

Armando Nava
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Attorney for AARP

CERTIFICATE OF SERVICE

ORIGINAL and thirteen (13) copies of the foregoing filed
this 4 day of March, 2020

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HearingDivisionService by Email@azcc.gov

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